

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|  |   |                                 |
|--|---|---------------------------------|
| <b>BRIANNA GREENE, on behalf of herself<br/>and others similarly situated,</b> | ) |                                 |
|  | ) |                                 |
|  | ) |                                 |
| <b>Plaintiff,</b>  | ) | <b>Case No.: 10-cv-117</b>      |
|  | ) |                                 |
| <b>v.</b>  | ) | <b>Judge Charles P. Kocoras</b> |
|  | ) |                                 |
| <b>DIRECTV, INC. and IQOR, INC.,</b>   | ) |                                 |
|  | ) |                                 |
| <b>Defendant.</b>  | ) |                                 |
|  | ) |                                 |
|  | ) |                                 |

**MOTION FOR EXTENSION OF TIME**

Pursuant to Fed.R.Civ.P. Rule 6, defendant, iQor, Inc. (“iQor”), respectfully moves for a 28 day extension of time, up to May 5, 2010, in which to answer or otherwise plead to plaintiff’s complaint, stating as follows:

1. Plaintiff has filed an amended complaint against iQor and DirecTV, Inc. alleging claims under the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227, the Truth in Lending Act (“TILA”), 15 U.S.C. § 1642, and the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681c-1(h).

2. Only the TCPA claims in Counts I and II are asserted against iQor. Plaintiff alleges that an account with DirecTV was opened in her name, although she had not ordered the account. (Am. Cplt. ¶ 9-10). Plaintiff had registered with a credit bureau to receive fraud alert calls. (Am. Cplt. ¶ 11). Plaintiff alleges that iQor, at the direction of DirecTV, made a fraud alert call to her cell phone, notifying her that a DirecTV account had been opened in her name and asking her to notify DirecTV if she had not authorized the order. (Am. Cplt. ¶ 15-16). Plaintiff alleges that the fraud alert call violated § 227 of the TCPA because it was made to her cell phone using an “automatic telephone dialing system,” and had not consented to receive such calls.

3. Plaintiff seeks to bring the TCPA claims in Counts I and II on behalf of similarly situated people who had cell phone numbers with area codes within the Seventh Circuit.

4. iQor was served with the summons and complaint on March 17, 2010. Its response to the complaint, with no prior extensions of time, is due April 7, 2010.

5. iQor respectfully requests a 28 day extension of time, up to and including May 5, 2010, in which to answer or otherwise plead to the complaint. To respond to the complaint, iQor's counsel must review its records concerning the plaintiff, investigate the allegations of the complaint, research the law, and draft the responsive pleading. Because of professional commitments in other cases, iQor's counsel request an additional 28 days beyond the current deadline to prepare the responsive pleading.

6. This extension is not requested for purposes of delay. It will not prejudice any party to the case.

WHEREFORE, iQor, Inc., respectfully requests that this Honorable Court grant it a 28 day extension of time, up to May 5, 2010, in which to answer or otherwise plead to plaintiff's complaint.

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Respectfully submitted:

IQOR, INC.

By:/s/ Peter E. Pederson  
One of its Attorneys

**CERTIFICATE OF SERVICE**

The undersigned attorney certifies that on April 5, 2010, I served this document by filing it with the Court's CM/ECF system, which will make copies of the documents available to all counsel of record.

/s/ Peter E. Pederson \_\_\_\_\_

**Service List**

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